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ALLISON CURLEY
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October 15, 2013

United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 112101
Attn.: Hon. Judge Brian M. Cogan

Re: **Schonbrun v. Amtrack, Metropolitan Transportation Authority, The
Long Island Rail Road
Index No.: CV 13-4852**

Dear Hon. Judge Cogan:

Please be advised that our office represents the Plaintiff in the above-referenced matter. An initial case management conference in accordance with Fed. R. Civ. P. 16 has been scheduled for **Wednesday, October 16, 2013 at 4:45PM**. A request to adjourn this conference is being made on consent of the attorney for the defendants.

Unfortunately, the ECF filings for this matter were being directed to an incorrect email address (which was rectified on this date) and our office became aware of this conference earlier today. Moreover, Defendants only filed their Answer on or about October 7, 2013 making it difficult to comply with the requirement to both conference this case, prepare the necessary discovery plan and submit the joint letter to chambers regarding the nature of this action.

This is the first request for an adjournment in this matter. It is requested that the conference be adjourned three weeks to permit adequate notice to Defendants and preparation of the discovery plan and discovery.

Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me directly. Thank you for your attention to this matter

Very truly yours,

LAW OFFICES OF NEIL MOLDOVAN, PC

By: _____

Nancy Pavlovic